

RAVEN & KOLBE, LLP
Keith A. Raven, Esq. (KR-8086)
Attorneys for Defendant
ECKERD CORPORATION d/b/a RITE AID
and RITE AID CORPORATION, s/h/a
RITE AID CORPORATION d/b/a "RITE AID"
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

-----X	:	
CHRISTOPHER STEVENS,	:	Civil No.: 13-CV-783 (TJM/DEP)
	:	
Plaintiff,	:	NOTICE OF MOTION FOR
	:	<u>SUMMARY JUDGMENT</u>
-against-	:	
	:	
RITE AID CORPORATION d/b/a RITE AID	:	
PHARMACY, a/k/a ECKERD CORPORATION	:	
d/b/a RITE AID,	:	
	:	
Defendants.	:	
-----X	:	

C O U N S E L O R S:

PLEASE TAKE NOTICE, that upon the annexed Attorney Certification of Keith A. Raven, Esq., duly sworn the 1st day of October, 2014, the exhibits annexed thereto, the Statement of Undisputed Material Facts pursuant to Local Civil Rule 7.1(a)(3), dated October 1, 2014, the Memorandum of Law, dated October 1, 2014, together with all of the pleadings and proceedings heretofore had herein, defendants, ECKERD CORPORATION d/b/a RITE AID and RITE AID CORPORATION, s/h/a RITE AID CORPORATION d/b/a "RITE AID" ("moving defendants"), by and through their attorneys, Raven & Kolbe, LLP, will move this Court at the United States District Courthouse, James T. Foley Courthouse, located at 445 Broadway, Suite 509, Albany, New York 12207, before the Honorable Justice Thomas J.

McAvoy, U.S.D.J., on **November 10, 2014**, for an Order granting Summary Judgment and Complete Dismissal of plaintiff's Complaint in favor of the moving defendants pursuant to Fed. R. Civ. P. 56 (a); together with such other, further or different relief, which this Honorable Court may deem just and proper.

Dated: New York, New York
October 1, 2014

Respectfully submitted,

RAVEN & KOLBE, LLP

By: 

Keith A. Raven (KR-8086)
Attorneys for Defendants
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and RITE AID CORPORATION s/h/a RITE AID
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